

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

JESSICA WILLIAMS, SHERYL FRITZ)	
AND JAMIE TERRY, Individually and on)	
behalf of all other similarly situated Corizon)	
Correctional Nurses,)	Cause No.:6:19-cv-03365-SRB
)	
Plaintiffs,)	
v.)	
)	
CORIZON HEALTH, INC. and)	
CORIZON, LLC)	
)	
Defendants.)	

**MOTION TO AMEND EXHIBITS TO MOTION FOR CLASS
CERTIFICATION**

COME NOW, Plaintiffs, by and through their undersigned attorney, and move the Court to file amended exhibits to its Suggestions in Support of its Motion for Conditional Certification (Doc. 59), and in support thereof, state:

1. Plaintiffs filed their Motion for Conditional Certification under the FSLA on August 31, 2020. Doc. 58. Plaintiffs wish to correct errors in Declarations filed as exhibits to the Suggestions in Support of the Motion. Doc. 59. Defendants do not agree to this Motion and the parties are still resolving issues regarding conditional class certification and will jointly report to the court soon.

2. As Exhibits to the Suggestions in Support (Doc. 59), Plaintiffs attached 10 declarations of employees of Corizon. These included declarations from the three class Plaintiffs as well as declarations of other Corizon nurses. Counsel for Plaintiffs have recently learned that some statements in these declarations were not accurate. These inaccuracies were brought to the attention of Plaintiffs' counsel last week during depositions of the Plaintiffs.

3. So, counsel for Plaintiffs have reinterviewed the declarants and have redone the declarations for the Suggestions in Support of the Motion for Class Certification. All declarants other than Carol Luedeman (Exhibit 10) have reviewed and signed new, amended declarations. Attached hereto as Amended Exhibits 1 through 9 are amended declarations of these Declarants. Plaintiffs' counsel has not yet been able to communicate with Ms. Luedeman and wanted to present this issue and the Amended Declarations to the Court and Defendants to correct this error as soon as possible.

4. This Motion is made to correct errors made by Counsel for Plaintiffs, and the misrepresentations in the Declarations from those errors, and is not intended for delay or any improper purpose.

5. Plaintiffs request the Court order the attached Amended Declarations replace the prior Declarations filed as Exhibits 1 through 9 to Doc. 59.

WHEREFORE, Plaintiffs respectfully the Court: grant this Motion; order the attached Amended Exhibits 1 through 9 to replace the original Exhibits 1 through 9 of the Suggestions in Support (Doc. 59); and for any further just and proper relief.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on the 22nd day of October, 2020, the foregoing was sent via electronic mail to the following:

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